

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

JEFFERSON-PILOT INSURANCE  
COMPANY,

Plaintiff,

vs.

CHRISTOPHER L. KEARNEY,

Defendant.

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Case No. C-1-02-479

(Judge Spiegel)

**PRIVILEGE LOG**

The following documents have not been produced subject to a claim of privilege as specified below.

<b><u>Document Number</u></b>	<b><u>Document Identity</u></b>
2819-2820	Privileged communication from counsel to client
2932	Privileged communication from client to counsel
2934-2935	Privileged communication from client to counsel with notes
2938-2939	Privileged communication from client to counsel
2941-2944	Privileged communications from client to counsel
2949	Privileged communication from client to counsel
3151-3152	Privileged communication from counsel to client
3372	Privileged communication between counsel
3376	Privileged communication between counsel
3382	Privileged communication from client to counsel
3419	Privileged communication from client to counsel

<b><u>Document Number</u></b>	<b><u>Document Identity</u></b>
3421-3423	Internal communication of Rotzel & Andress
3430	Privileged communication between counsel
3480	Privileged communication between counsel
3493	Privileged communication between counsel
3497	Privileged communication from client to counsel
3508-3509	Privileged communication between counsel
3519	Privileged communication between counsel
3528	Privileged communication from client to counsel
3544	Privileged communication from client to counsel
3547	Privileged communication from client to counsel
3551	Privileged communication between counsel
3608-3609	Privileged communication from counsel to client
3610	Privileged communication from client to counsel
3616	Privileged communication from client to counsel
3623	Privileged communication from client to counsel
3625	Privileged communication from client to counsel
3643-3645	Privileged communication from counsel to client
3646	Privileged communication from client to counsel
3648	Privileged communication from client to counsel
3649	Privileged communication from counsel to client
3651	Privileged communication from counsel to client
3666	Privileged communication from counsel to client

<b><u>Document Number</u></b>	<b><u>Document Identity</u></b>
3668	Privileged communication from counsel to client
3669	Privileged communication from counsel to client
3671	Privileged communication from counsel to client
3674	Privileged communication to counsel from client
3677	Privileged communication to counsel from client
3678	Privileged communication from counsel to client
3680	Privileged communication from counsel to client
3691	Privileged communication from client to counsel
3697	Privileged communication from client to counsel
3705	Privileged communication between counsel
3707-3717	Privileged e-mail communication between counsel
3719-3723	Privileged communication between counsel
3724	Privileged communication between counsel
3726-3727	Privileged communication between counsel
3729-3773	Privileged communication between counsel
3777-3780	Privileged communication from counsel to client
3788-3789	Internal communication of Plaintiff's former counsel

In addition, the following privileged documents were inadvertently disclosed. These are clearly privileged communications which should be immediately returned to counsel for Plaintiff.

<b><u>Document Number</u></b>	<b><u>Document Identity</u></b>
564	Privileged communication from counsel to client
568	Privileged communication from counsel to client

570-71	Attorney work product
628-29	Privileged communication from counsel to client
3386-3387	Privileged correspondence from counsel to client
3388	Privileged e-mail communication between counsel
3393-3397	Privileged e-mail communication and correspondence between counsel and client
3400-3407	Privileged e-mail communications between counsel and client and hand-written attorney work product
3408-3409	Privileged correspondence from counsel to client
3410	Privileged correspondence from client to counsel
3411-3413	Privileged e-mail communications between counsel and client
3447-3450	Privileged correspondence from counsel to client
3657-3661	Attorney work product
3688	Privileged correspondence from client to counsel

Respectfully submitted,

s/Amy Gasser Callow

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